

1 ROBERT E. SCHUMACHER, ESQ.
2 Nevada Bar No. 7504
3 DIONE C. WRENN, ESQ.
4 Nevada Bar No. 13285
5 **GORDON REES SCULLY MANSUKHANI, LLP**
6 300 South 4th Street, Suite 1550
7 Las Vegas, Nevada 89101
Telephone: (702) 577-9300
Facsimile: (702) 255-2858
E-Mail: rschumacher@grsm.com
dwrenn@grsm.com

8 *Attorneys for Defendant,*
9 **WEST LAS VEGAS SURGERY CENTER, LLC**

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DANIEL ROZSNAKI,) CASE NO. 2:21-cv-01491-JAD-EJY
13 Plaintiff,)
14 vs.)
15 WEST LAS VEGAS SURGERY CENTER, LLC,) **JOINT REQUEST TO CONTINUE**
16 a Nevada Limited Liability Company,) **THE EARLY NEUTRAL**
17 Defendants.) **EVALUATION**
18) **[FIRST REQUEST]**

19 Pursuant to Local Rules 6-1, 7-1, and 16-6, Defendant WEST LAS VEGAS SURGERY
20 CENTER, LLC (“WLVSC”) and Plaintiff DANIEL ROZSNAKI (collectively, the “Parties”), by
21 and through their respective attorneys of record, hereby jointly request as follows:

22 1. On August 12, 2021, the Court scheduled the Early Neutral Evaluation Session
23 (“ENE”) for October 29, 2021 and further set the deadline to submit Confidential ENE
24 Statements for October 21, 2021. *See generally*, ECF No. 6.

25 2. On October 18, 2021, the Court issued a minute order continuing the ENE to
26 November 19, 2021.

27 3. Counsel for the Parties exchanged correspondence regarding the current date for
28 the ENE. Defense counsel notified Plaintiff’s counsel that Defendant’s representative is

Gordon Rees Scully Mansukhani, LLP
300 S. 4th Street, Suite 1550
Las Vegas, NV 89101

1 unavailable on November 19, 2021, and Defendant is unable to secure an alternative
2 representative with settlement authority.

3 4. The Parties respectfully request that the Court reschedule the ENE. The parties
4 propose December 3, 2021 or December 17, 2021.¹ If neither date meets with the Court's
5 availability, the Parties respectfully request that the Court continue the ENE to a Friday after the
6 Christmas and New Year holidays.

7 5. The Parties further request that the deadline to submit Confidential ENE
8 Statements be rescheduled to comport with the new date for the ENE.

9 6. This request is sought in good faith and not for the purposes of delay.

10 7. This is the first request to continue the ENE

11 DATED this 5th day of November, 2021. DATED this 5th day of November, 2021.

12 **GORDON REES SCULLY
MANSUKHANI, LLP**

KEMP & KEMP, ATTORNEYS AT LAW

14 /s/ *Dione C. Wrenn*

15 ROBERT E. SCHUMACHER, ESQ.
16 Nevada Bar No. 7504
17 DIONE C. WRENN, ESQ.
18 Nevada Bar No. 13285
19 300 South 4th Street, Suite 1550
Las Vegas, Nevada 89101
Attorneys for Defendant,
West Las Vegas Surgery Center, LLC

14 /s/ *James P. Kemp*

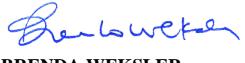
15 JAMES P. KEMP, ESQ.
16 Nevada Bar No. 006375
17 7435 W. Azure Drive, Suite 110
18 Las Vegas, Nevada 89130
Attorney for Plaintiff,
Daniel Rozsnaki

20 **Order**

21 IT IS ORDERED that ECF No. 14 is
22 GRANTED. The Court will issue a new
23 Scheduling Order.

24 **IT IS SO ORDERED**

25 **DATED:** 11:47 am, November 08, 2021

26 
27 BRENDA WEKSLER
28 UNITED STATES MAGISTRATE JUDGE

1¹ Counsel for Plaintiff is not available on December 10, 2021.